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MEMORANDUM

CH2M HILL

PREPARED FOR: Sylvia Burges/EPA Region 10

OCT 16 1995

DATE: October 11, 1995

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CH2M HILL

TECHNICAL STATUS REPORT

PREPARED FOR: Sylvia Burges/EPA Region 10

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PREPARED BY: Liz Luecker/CH2M HILL

DATE: October 11, 1995

SUBJECT: Rhône-Poulenc Monthly Status Report

SITE NAME AND LOCATION: Rhône-Poulenc Inc./Seattle Plant
Tukwila, WA

REPORTING PERIOD: September 1 through September 30, 1995

PROJECT: 106063.P1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RP) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

Progress Made This Reporting Period

Task P1-Project Management

The EPA Monthly Status Report was fax'd to EPA on September 8, and a hard copy was sent to the distribution list via regular mail on the same day.

Task A2-Applicable Regulations and Permits

Leasing Arrangements.

Northwest Container Services installed a secondary containment for the container wash water oil/water separator. An oil/water separator will be placed on this pad in early October. Northwest Container plans to use this area for washing out empty containers.

Storm Water Discharges.

Copies of the revised King County Storm Drain Easement for the line across the Rhône-Poulenc site were signed by RP and delivered to the King County Airport office on August 9. This agreement was signed by King County and returned to RP during the week of September 11.

Outfall 7 Storm Water Line Rinsate Sampling

Storm water lines were cleaned out in July and August. A sample was taken to determine the effectiveness of the cleaning. Prior to sampling, the outfall 7 line was flushed by opening 2 fire hydrants and letting the water flow to the end of the line. The line was flushed 3 times up gradient of the oil/water separator and two times from the oil/water separator to the closed outfall 7 valve. A vacuum truck was used to take these various rinses out of the last manhole and the oil/water separator. The water was stored in CH2M HILL took the sample of the last rinse.

These data included 1.4 ppb Arochlor 1254, 44.21 ppb DDE, 1.9 ppm Cu, 0.14 ppm Pb, 0.32 ppm Zn, and 0.0056 ppm Hg. Since some of these contaminants may cause exceedance of the water quality criteria, the lines were cleaned again.

On September 16, Ventilation Power cleaned the outfall 7 lines again. The water from this cleaning was sent to METRO with verbal approval by Cynthia Wellner/METRO who was on site on September 13.

Sewer Lines Clean Out.

Ventilation Power was on site on September 16 cleaning some additional lines that are no longer in use. These lines were grouted by Kohl Excavating after the lines were cleaned. This work included the storm line through the manhole between the old maintenance building and the tank farm, the inlet to the manhole of the line that drained the lab sinks to the process sewer, the inlet to the manhole of the line west of the METRO sump, and the catch basins to the process line around the old shop on the south side of the plant near Slip 6.

Gelco was contracted to videotape the 8" PCB contaminated sewer to identify tributaries off the main lines. On September 18 Gelco tried to videotape the PCB line from the exposed north trending 8" clay pipe in the PCB pipe ditch (the sediment containing 1.3% PCBs came from this pipe); however, the camera couldn't get enough traction to move forward, due to sediment in the line. As a result, the line was cleaned prior to videotaping. Gelco is now planning to videotape the line on October 12. Gelco is currently working with EPA and Texaco on a job at the Texaco Anacortes facility and will not be available until after the first week in October.

On September 19 Ventilation Power cleaned the 8" clay pipe going north from the ditch until an obstruction was encountered 69' from the ditch opening; the 10" clay pipe trending west from the ditch was cleaned until a possible obstruction was encountered at 17'. The 10" clay pipe trending south from the ditch was cleaned from the ditch to the manhole, approximately 46'. There were two pipe openings in the manhole; however AETS went into the manhole

and determined that the openings came from the same pipe. The pipe wyed just before it went into the manhole.

AETS, a subsidiary of Chemical Waste Management, subcontracted Ventilation Power to clean out the outfalls and arranged for all decon, sampling, and disposal of the clean out. The ends of the outfall 2, 3, and 4 lines to be cleaned are actually located on Boeing property. On September 19 Dennis Bourcier/Boeing and Keith Badgley/Boeing called Ginger Knox/CH2M HILL and granted verbal access for the outfall clean out. On September 20, outfall 2, a 4" pipe, was cleaned out. While opening the plug at the end of outfall 2, the pressure in the pipe caused the plug to blow out at approximately 9:29 AM. the plug was re-tightened by 9:36. An estimated 15 gallons of water were discharged onto the riprap next to Slip 6 in approximately 20-30 seconds. The area covered by the spilled water extended from the end of the pipe, approximately 10' above the water line, and extended approximately 6' along the shoreline. AETS placed sorbent pads on the spill. The observed spilled water was clear with no visible sheen. A light sheen was noted on the water in Slip 6 that started in the general area of the spill and proceeded west. Edwin asked that a boom be brought to the site and AETS complied. A boom was delivered to the site by another Chem Waste subsidiary at 10:48 AM. At the request of Boeing, cleaning was suspended until Dennis Bourcier/Boeing came on site. Dennis requested that a larger plastic drum, capable of handling a larger spill, be cut and placed under the outfalls so that any additional spills could be collected. Prior to this AETS had used a large bucket. Outfall 2 was cleaned by 12:13; approximately 254' of pipe were cleaned. Upon inspecting the PCB ditch area, it was apparent that during the outfall 2 cleaning, the cleaning nozzle came out of a 4" concrete line adjacent to the PCB contaminated 8" line. Based on this, it appears that the line contaminated by PCBs was not connected to outfall 2, unlike what was shown on the facility drawings.

Boeing decided to report the spill to the appropriate authorities, since a discharge had occurred.

On September 21 the plug in outfall 3 was removed; clean water with a trace of sediment came out and was gathered in a drum. Outfall 3 was cleaned to approximately 100' from the end of pipe when an obstruction was encountered. Part of outfall 4 was cleaned; however, black liquor was encountered at the slip 6 end of the outfall, so the outfall was sampled by opening up another section using a backhoe. The outfall was cleaned 20' to the south and 60' to the north of this excavation.

On September 22, the end of outfall 4 was cleaned to the extent possible: the compression device in the center of the plug in outfall 4 broke. A suction hose was put on the end of the plug and as much as possible was sucked out through the hole. The pipe was then grouted up, and the plate on the end of the pipe was replaced. AETS also removed loose sludge from the process sump; however, a hard layer remained on the bottom. AETS will return to the site on Oct. 12 to attempt further cleaning of the sump.

Approximately 23,000 gallons of wash water from the sewer line cleaning are being stored on site in two Rain-for Rent tanks. The sludge is being stored on site in a tank, and the supernatant is being pumped to the same wash water Rain-for-Rent tank. If additional clean out of the sewer is needed based on the videotaping, this water will be placed in the Rain for Rent tank. The water will be filtered and sent through activated carbon prior to discharge to METRO, if the water meets the METRO discharge limits.

The sewer sediment sampling memorandum will be combined with the Round 3 Technical Memorandum, discussed below, for submittal to EPA. As discussed with Sylvia Burges/EPA 10, the memorandum will address the sampling event, clean out of the sewers, and remediation of the PCB-contaminated line.

Task A3-Interim Measures

PCB-Contaminated Compressor Pad.

On September 5, Sue Hays sent a letter to Cynthia Wellner/METRO documenting the discharge of treated water from the compressor pad remediation. The discharges consisted of 7,000 gallons of wastewater on July 26, 27, and 28 and 110 gallons of tank wash water on August 9.

Six remaining drums containing used fabric filters, water containing suspended solids, recovered sediment from rented storage tanks, and activated carbon are being stored on site and will be disposed of with waste from the remediation of the PCB-contaminated sewer line.

LNAPL.

RP monitored the wells for LNAPL on September 29. Four wells were not accessible at this time since containers were being stored on top of them; these wells were MW-12, H11, B4, and MW-13. These wells were monitored on October 4.

Although little LNAPL was present in the wells, the LNAPL appears to be returning. 0.03 inches of LNAPL were detected in MW-12 on September 29. Oil globules were visible in the MW-12 sample, while clear globules were visible in H11. Well MW-19 had a slight sheen that evaporated instantly, while C1 had a sheen that the sampler though might be due to surface contamination in the well head area. This will be investigated in Oct. The remaining wells surveyed did not contain LNAPL. Information on the LNAPL thicknesses is attached.

Task A8-Round 3 Technical Memorandum

On September 7 CH2M HILL received PACE MidPacific's final response to CH2M HILL's 8/3 memo. The response was incomplete eg. not all dilution data are available. The electronic submittal was received by CH2M HILL on September 18. These submittals resulted in changes to the database, and some changes in the action level exceedances discussed in the 7/25 meeting with EPA and Ecology. However, the overall picture at the site has not changed.

Work continued on the Round 3 Technical Memorandum. As indicated above, the data revisions resulted in changes to the action level exceedances and constituents detected. These are currently being incorporated into the text and tables. In addition, as discussed above under Sewer Lines, the clean out of the storm sewers has had some glitches. As previously discussed, the PCB contaminated line was erroneously identified as going to outfall No. 2. In addition, the 8" PCB line needs to be videotaped to ensure adequate clean out. However, the only qualified local firm is not available until after the first week in October; therefore this

portion of sewer clean out will not be available to write up until some time after that. The water from sewer clean out is currently stored in two Rain for Rent tanks on site; if additional clean out of the sewer is needed based on the videotaping, this water will be placed in the Rain for Rent tank. The water will be filtered and sent through activated carbon prior to discharge to METRO, if the water meets the METRO discharge limits.

Task S1-Miscellaneous Field Support

Well head rehab and replacement was completed on September 18. The number of wells needing heavy duty well heads changed from 5 wells (4 well heads, 2 of the wells were in the same well head) to 17 wells (15 well heads, 2 sets of 2 wells are in the same well head).

Because of the subgrade failure discussed in previous monthly status reports, the well heads are now designed with a slip sleeve around the well to allow for compression of the subgrade; the top of the well casing in the new well heads will need to be monitored regularly to determine if the subgrade is compressing and causing the casing to rise in the well head. The casing may need to be cut off periodically if this occurs. In addition, the well head platform was changed from 2' to 3' square, rebar was tied rather than tack-welded, and a geotextile was added at the base of the gravel-bearing layer so that clay would not pump into the gravel and cause subgrade failure at the well.

Well heads replaced during the week of September 5-8 were MW-20, MW-19, MW-12, MW-13, H-11, and DM-5. During excavation, well head DM-5 was found to have a cement bottom at 15" below the existing grade; this could not be removed without destroying the well. Therefore, a modified well head was placed at this location.

Wellheads replaced the week of September 11-15 were DM-3A, DM-3B, B6, B5, B4, B2, DM-1A, DM-1B, and A2. The wellhead at DM-4 was excavated this week, and the new wellhead was ready for the concrete pour when one of Northwest Container's forklifts ran into the excavation and crushed the well and rebar framing. On September 18 Hokkaido Drilling dug out the wellhead until a joint in the well casing was found, repaired the well, remade the concrete forms, bent the rebar for the new well head, and had additional concrete delivered to the site.

Task S2-Other Technical Support

On September 5, Hays Consulting called EPA to notify them of the PCBs in the sewer line, as discussed in 40 CFR 761. EPA TSCA branch told her that no notification was needed since the site already has an EPA hazardous waste identification number.

Deliverables Submitted

The August Progress Report was submitted to U.S. EPA on September 8, 1995.

On September 5, Hays Consulting sent a letter to Cynthia Wellner/METRO documenting discharge of treated water from the compressor pad remediation.

Progress Planned For Next Reporting Period

Task A2-Applicable Regulations and Permits

Leasing Arrangements.

The remainder of the paving work will be completed by Segale; this includes the area north of the North Road next to the old change house (Kohl Excavating will install a catch basin in this area), patch work in the old north tank farm near the lab, the graveled area of South Road excavation (Kohl Excavating will install a new catch basin in this area), the PCB ditch area, a piece near the southwest corner of the Distribution Center/Warehouse, and the area between the railroad tracks south of the old maintenance building (the former black liquor unloading area). The area south of the maintenance building slab may be paved, depending on cost.

Storm Water Discharge.

Outfall 7 will be re-opened to the Duwamish Waterway as soon as possible. Prior to opening the outfall, a storm event will be sampled according to NPDES guidelines. This additional sampling will probably occur during the week of October 9.

Sewer Lines.

The solidified sewer clean out sludge in the 2 roll offs will be disposed of at Chem Waste, Arlington by AETS.

Approximately 23,000 gallons of wash water from the sewer line cleaning are being stored on site in two Rain-for Rent tanks. One tank contains water that is from the PCB contaminated line clean out and is expected to contain PCBs. The sludge is being stored on site in a tank, and the supernatant is being pumped to the less full wash water Rain-for-Rent tank. If additional clean out of the sewer is needed based on the videotaping, this water will be placed in one of the Rain for Rent tanks. A third tank for treated wash water will be rented, and the stored wash water will be filtered and sent through activated carbon into this third tank. The treated water will be sample for discharge to METRO, if the water meets the METRO discharge limits.

The additional sediments will be taken to Chemical Waste Management for solidification and disposal at Arlington. If the water does not meet the METRO discharge limits, it will also be sent to Chemical Waste Management for disposal.

The PCB contaminated line will be traced using a video camera to see that the entire line has been cleaned. Gelco will perform this work on October 12. The PCB contaminated sediments and wash water will be treated and disposed of by AETS. The PCB contaminated sediments will be disposed of with the remaining compressor pad debris and the soils and debris from the PCB ditch.

Because of the very high concentrations of PCBs detected in the sewer sediments, the soils and pipe excavated from the ditch used to access and sample the outfall 2 line may be

contaminated with PCBs. This ditch will be excavated and associated soil piles removed. Post excavation samples will be taken to determine if the area is clean as discussed in 40 CFR 761.

Task A3-Interim Measures

LNAPL.

Continue to monitor LNAPL thicknesses in monitoring wells monthly.

Task A8-Round 3 Data Technical Memorandum

Based on the problems associated with data validation and the need for additional sewer line cleaning, the Round 3 Data Technical Memorandum will be submitted in early January 1996.

rhône-p/MSR9-95.EPA

RHONE POULENC - MARGINAL WAY FACILITY
MONTHLY LNAPL SURVEY LOG
Floating Product Layer Thickness in Feet

Date Sampled	H10	H1	MW12	H11	DM7	H9	H6	DM2A	DM2B	DM8	A9	DM3A	DM3B	A2	A4	DM4	B4	B2	DM5	B1A	B1B	C1	DM6	B5	G3	G1	B6	MW13	MW14	MW15	MW16	MW17	MW18	MW19	MW20	DM1A	DM1B	E3
6/7/94	0		0																																			
6/8/94	0		0																																			
6/17/94	Film	0	0.007	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0											
8/4/94	Film	Sheen	Sheen	Film	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0											
9/8/94	Film	0	Film	0.01	0	Sheen	Sheen	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.021	0.005	0	0	0.01	0			
10/6/94	0	0	Sheen	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	Sheen	0	0	0	0.021	0			
11/3/94	0	0	0.005	0.005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0.01	0	0	0		0			
12/5/94	0	0	0	Sheen	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	Sheen	0	0	0	0	0			
1/11/95	0.26 [a]	Sheen	Sheen	0.04 [d]	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0.01 [a]	0	0	0	Sheen	0			
2/17/95	2.01	0	0.16	Sheen	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0 [b]	0	0	0	0	NA	0	0	0	0	0	0	0	0	Sheen	Sheen	0			
3/23/95	0.01										0	0	0	0	0 [c]					0	0	0													0	0	Sheen [c]
3/27/95		0	Sheen	0	0	0	0	0	0	0						0	0	0	0				0		0	0	0	0	0	Sheen	0	0	Sheen	Sheen	0			
3/28/95																								0														
4/27/95	0.063	0	Film [d]	0		0				0	0	0	0	NA	0		0	0	0	0	0	0	0	0	0	0	0	0	0			0	0.063 [e]	Sheen	0			
4/28/95					0		0	0	0							0														0	0						
5/31/95	0.01	0	Film	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
6/30/95	Sheen [d]	0	Film	NA	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	Sheen	Sheen	0	0	Sheen	0	0			
7/28/95																	0			0		0	0	0				0	0					0			
7/29/95	Sheen	0	Sheen	NA	0	0	0	0	0	0	0	0	0	NA	0	NA		0	0		NA				0	0	0			0	0	0	0	0				
8/26/95	Sheen	0	Sheen	0	0	0	0	0	0	0	0	0	0	NA	0	NA	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	Sheen	0			
9/29/95	0.03	0			0	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	Sheen	0	0	0	0	0		0	0	0	0	0	Sheen	0			
10/4/95			Sheen [d]	[d]													0											0										

[a] Solinst Model 121 oil/water interface probe. After 1/11/95, all wells were monitored using this probe when signficant LNAPL is present.
[b] No sheen noted when measurement device was placed in clean water, but water turned light brown after probing.
[c] Orange/rust colored residue on probe.
[d] Globules.
[e] Dark Phase.